July 14-15 Meeting with Hyperion's Air Quality Consultant

DENR met with Colin Campbell, Hyperion's air quality consultant, to clarify questions that arose during the technical review of Hyperon's Prevention of Significant Deterioration air quality permit application. The following is a summary of the meeting:

- **Flare operation:** The operation of the flares for the refinery and the flare for the Integrated Gasification Combined Cycle (IGCC) are different. The refinery flares would only be used during a malfunction. However, the IGCC flare would need to be used during startup, shutdown and malfunctions for safety reasons. Understanding the operations of the flares will impact how the proposed Flare Minimization Plan will be written.
- **Tail gas:** There are different types of tail gas. The pressure swing adsorption "PSA" tail gas is produced as part of the IGCC system process. The sulfur recovery plant also produces tail gas, which has different characteristics. Hyperion proposed emission limits are dependent upon the type of gas burned. Understanding the different types of gases will impact which regulations apply and how DENR reviews the proposed emission limits.
- **New Source Performance Standard OOO:** Hyperion's application identified that 40 CFR Part 60, Subpart OOO was applicable in the application, but there was no mention of a milling operation. The applicability of this subpart is dependent upon if there is a milling operation. Hyperion's consultant stated that a milling operation may occur within the flux unloading building.
- **New Source Performance Standards GGGa and VVa:** EPA promulgated two New Source Performance Standards that may be applicable to Hyperion. 40 CFR Part 60, Subpart GGGa – Standards of Performance for Equipment Leaks of VOC in Petroleum Refineries for which Construction, Reconstruction, or Modification Commenced After November 7, 2006, was promulgated on November 16, 2007 (72 Federal Register 64896). 40 CFR Part 60, Subpart VVa – Standards of Performance for Equipment Leaks of VOC in the Synthetic Organic Chemicals Manufacturing Industry for Which Construction, Reconstruction, or Modification Commenced After November 7, 2006, was promulgated on November 16, 2007 (72 Federal Register 64883).
- **Compliance Methods:** There are several methods that may be used to demonstrate compliance with the proposed emission limits such as performance tests, continuous emission monitoring, design criteria, recordkeeping, reporting, etc. Hyperion's application proposed emission limits using different compliance demonstration methods. These were discussed in more detail to ensure they were understood.
- **Design Capacity:** Hyperion's design of the facility is based on refining 400,000 barrels of crude oil per day and that the IGCC facility will produce the energy needs for Hyperion and will not be used for outside interests. DENR and Hyperion's consultant discussed if these values were maximum operational daily limits or a maximum operational average daily limit over a calendar year. These design values may impact the proposed operational and emission limits and may impact the proposed requirements for the draft permit.
- **Redundant Systems:** The application identifies that there will be redundant systems installed within the refinery. Understanding how these redundant systems will be operated may impact the proposed requirements for the draft permit.